

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOHN WILSON and  
CHARLES STILL,

Plaintiffs,

- against -

EDWARD “EDDIE” PERRELL d/b/a PERRELL  
MUSIC, DYNATONE PUBLISHING COMPANY,  
WARNER CHAPPELL MUSIC, INC.,  
UNIVERSAL MUSIC GROUP, INC.,  
BROADCAST MUSIC INC. (BMI), and  
ANHEUSER-BUSCH COMPANIES, INC.

Defendants.

Civil Action No.: 16 Civ. 00104 (PAE)

ECF Case

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the Complaint and Cross-Complaint on file herein, and the Memorandum of Law in Support of Motion to Dismiss dated August 1, 2016 and accompanying Declaration of Robert A. Jacobs executed on August 1, 2016 and exhibits thereto submitted by Defendants UMG Recordings, Inc. (“UMG”) (sued incorrectly as Universal Music Group, Inc.), Unichappell Music, Inc. (sued incorrectly as Warner/Chappell Music, Inc.) and Dynatone Publishing Company (collectively, “Defendants”), and all prior proceedings and filings herein, Defendants, by and through their undersigned attorneys, will move this Court, before the Honorable Paul A. Engelmayer, at the Thurgood Marshall United States Courthouse, Courtroom 1305, 40 Foley Square, New York, New York 10007, at a date and time to be determined by the Court, for an Order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing with prejudice all claims of Plaintiffs John Wilson and Charles Still against Defendants and the cross-

claim of Defendant Edward Perrell against UMG; and for any other and further relief the Court deems equitable and just.

Dated: New York, New York  
August 1, 2016

Respectfully submitted,

MANATT, PHELPS & PHILLIPS, LLP

By: /s/ Robert A. Jacobs  
Robert A. Jacobs  
7 Times Square  
New York, NY 10036  
Telephone: (212) 790-4500  
Facsimile: (212) 790-4545  
E-Mail: rjacobs@manatt.com

*Attorneys for Defendants UMG Recordings, Inc. (sued incorrectly as Universal Music Group, Inc.), Unichappell Music, Inc. (sued incorrectly as Warner/Chappell Music, Inc.) and Dynatone Publishing Company*

To: Lita Rosario, Esq.  
WYZ Girl Entertainment Consulting, LLC  
Suite 315  
1100 H Street, NW  
Washington, D.C. 20005

Donald K. Wilson, Jr.  
Zhong Lun Law Firm  
4322 Wilshire Boulevard  
Los Angeles, CA 90010